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In Propria Persona

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14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18
19 **CHRISTOPHER S. WADSWORTH, M.D.,**
20 Plaintiff,

21 v.

22 **JEFFREY BEARD; J. CLARK KELSO;**
TIMOTHY BELAVICH; EUREKA DAYE;
23 **ANDREW DEEMS; ERIC MONTHEI;**
CHERA VAN BURG; LAURA WHYTE;
24 **RACHEL CHEN; COURTNEY**
CORRADO; and DOES 1 through 50,
25 **inclusive,**

26 Defendants.
27
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Case No. 3:15-cv-02322

**STIPULATED REQUEST FOR
EXPEDITED HEARING RE
SETTLEMENT AGREEMENT;
PROPOSED ORDER**

1 **STIPULATED REQUEST FOR EXPEDITED HEARING RE SETTLEMENT**
2 **AGREEMENT**

3 **I. BACKGROUND**

4 In June 2017, the parties to this action globally settled their pending legal disputes,
5 including this case. A copy of the fully executed Settlement Agreement and Release (Agreement)
6 was provided to the Court at the last case management conference (CMC), as Exhibit A to the
7 CMC statement. Pursuant to the Agreement, the Court dismissed this case, and ordered the
8 parties to post-settlement mediation to try to resolve ongoing disagreements about the enforceable
9 terms and conditions of the Agreement.

10 The California Department of Corrections and Rehabilitation (CDCR) and Dr. Chris
11 Wadsworth attended mediation on December 4, 2017.

12 The CDCR and Dr. Wadsworth disagreed about whether the Agreement requires Dr.
13 Wadsworth to transfer from San Quentin State Prison (San Quentin) to Folsom State Prison
14 (Folsom), effective January 1, 2018, and they were unable to resolve this issue at the mediation
15 on December 4, 2017. At the mediation, the CDCR and Dr. Wadsworth stipulated to an
16 expedited hearing and simultaneous briefing schedule, and agreed to jointly request an expedited
17 hearing on the transfer issue prior to the effective date of the transfer.

18 The other defendants are not involved in the transfer dispute, and have agreed to postpone
19 their involvement in the ongoing post-settlement mediation until after the transfer dispute is
20 resolved. Dkt. 70-71.

21 **II. STIPULATED HEARING REQUEST**

22 The CDCR defendants and Dr. Wadsworth stipulate to, and request, the following
23 expedited hearing and briefing schedule:

- 24 1. The Court will have an expedited hearing at 1:30 p.m. on December 21, 2017 to
25 determine whether, pursuant to the settlement agreement, Dr. Wadsworth is required to transfer
26 from San Quentin to Folsom, effective January 1, 2018.
- 27 2. The CDCR and Dr. Wadsworth will file their respective moving briefs regarding the
28 transfer to Folsom on December 12, 2017.

1 3. The CDCR and Dr. Wadsworth will file their respective reply briefs regarding the
2 transfer to Folsom on December 15, 2017.

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4 Dated: December 8, 2017

Respectfully submitted,

5 XAVIER BECERRA
6 Attorney General of California
7 MIGUEL A. NERI
8 Supervising Deputy Attorney General

9 /s/ Lyn Harlan
10 LYN HARLAN
11 Deputy Attorney General
12 *Attorneys for Defendants Jeffrey Beard,*
13 *Rachel Chen, Courtney Corrado, Chera*
14 *Van Burg, and Laura Whyte*

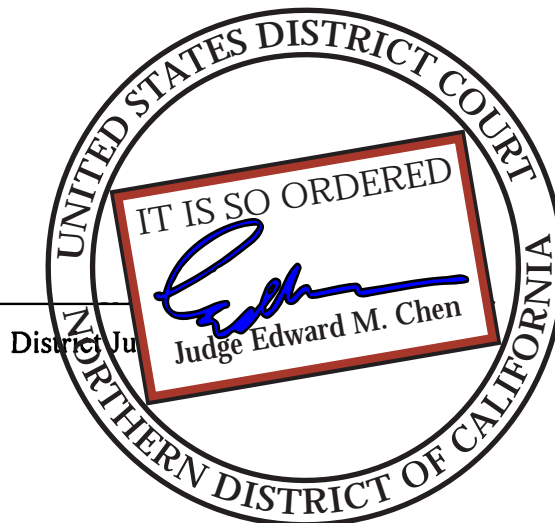
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19 Dated: December 8, 2017

/s/Christopher Wadsworth, M.D.

20 Christopher Wadsworth, M.D.
21 *In Propria Persona*

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27 **IT IS SO ORDERED.**

28 Dated: 12/8/17



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